

John M. Pierce (Bar No. 250443)
jpierce@johnpiercelaw.com
JOHN PIERCE LAW P.C.
21550 Oxnard Street, 3rd Floor
Woodland Hills, CA 91367
Tel. (321) 961-1848
Attorney for Defendant
Rowland Marcus Andrade

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROWLAND MARCUS ANDRADE,

Defendant.

Case No. 20-cr-00249-RS

**DEFENDANT'S MOTION FOR
ADMINISTRATIVE RELIEF TO
ENLARGE TIME**

DEFENDANT'S MOTION FOR ADMINISTRATIVE RELIEF TO ENLARGE TIME

Defendant Rowland Marcus Andrade, by and through undersigned counsel, respectfully moves for administrative relief under Civil Local Rule 7-11 (incorporated in criminal proceedings by Crim. L.R. 2-1) to enlarge the time for the filing of his opposition to the Government's Motion for Forfeiture of Property (*Application of the United States for Order Issuing Forfeiture Money Judgment*). ECF No. [762].

On September 16, 2025, the Court entered an order granting in part the government's request for forfeiture and restitution but without setting forth the factual basis for the amounts awarded. ECF No. [740]. It is the defense's understanding, based on comments at the hearing, that the Court may have suggested the supporting record already exists. Counsel is currently reviewing relevant filings, including ECF Nos. [711, 713, 721, 728, 732, 737].

DEFENDANT'S MOTION FOR ADMINISTRATIVE RELIEF TO ENLARGE TIME

1 The government's opposition papers rely heavily on sealed exhibits that are attached to
2 the Declaration of FBI Forensic Accountant Theresa Chiu. *See* ECF No. [732] Ex.'s 1-2. These
3 materials were filed under seal and delivered manually to the Clerk's Office due to their size.
4 Despite diligent efforts, current defense counsel has not yet been able to access or review them.
5 Counsel has contacted Mr. Andrade's prior counsel and the government to obtain secure access
6 so that the evidence underlying the government's calculations can be carefully examined.
7

8 Because of the volume of filings and the importance of ensuring that any forfeiture award
9 rests on a correct factual foundation, Defendant respectfully requests this short extension of six
10 days (just under one week) to complete the review and file an informed opposition. The
11 requested extension applies only to the forfeiture opposition deadline; Defendant will file tonight
12 his reply regarding bond pending appeal.
13

14 Dated: October 3, 2025

15 Respectfully submitted,
16

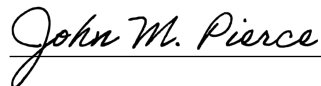
17 
18 John M. Pierce (SBN 250443)

19 John Pierce Law, P.C.
20 21550 Oxnard Street, 3rd Floor, PMB 172
21 Woodland Hills, CA 91367
22 Tel: 321-292-2366
23 jpierce@johnpiercelaw.com

24 *Attorney for Defendant Rowland Marcus Andrade*
25
26
27
28

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 3, 2025, a true and accurate copy of the above and foregoing was filed on the above date with the Clerk of Court, using the Court's CM/ECF system, which will automatically provide notice and a copy of said filing to all parties or attorneys of record registered therein.



John M. Pierce, Esq.